

Exhibit 257

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LINDA FAIRSTEIN,)	
)	
Plaintiff,)	Case No. 20-cv-8042 (PKC)
)	
v.)	Judge P. Kevin Castel
)	
NETFLIX, INC., AVA DUVERNAY, and)	
ATTICA LOCKE,)	
)	
Defendants.)	

**DEFENDANT AVA DUVERNAY'S FIRST SUPPLEMENTAL RESPONSES AND
OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

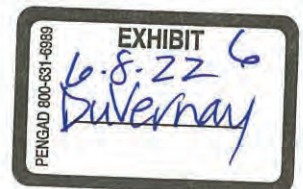
Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Ava DuVernay ("DuVernay"), by and through her undersigned counsel, hereby supplements her responses to the First Set of Interrogatories ("Interrogatories") from Plaintiff Linda Fairstein ("Plaintiff" or "Fairstein").

GENERAL OBJECTIONS

The following General Objections are incorporated by reference in each of DuVernay's Specific Objections and Responses set forth below.

1. DuVernay objects to Plaintiff's definitions and instructions to the extent these definitions and instructions seek to impose obligations on DuVernay beyond those imposed by the Federal Rules of Civil Procedure or the Local Rules of the United States District Court for the Southern District of New York.

2. DuVernay objects to each Interrogatory to the extent it seeks information outside of DuVernay's possession, custody, or control or that is not known or reasonably available to DuVernay.



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3. DuVernay objects to each Interrogatory to the extent that it requests information already in Plaintiff's possession; information that is publicly available; information to which Plaintiff has equal or greater access; or information that can be obtained through other means of discovery that are more convenient, less burdensome, or less expensive.

4. DuVernay objects to each Interrogatory to the extent it requires the disclosure of information protected by the attorney-client relationship, attorney work product doctrine, common interest privilege, joint defense privilege or any other applicable privilege. DuVernay hereby claims such privileges and protections to the extent available and excludes privileged or protected information or documents from these responses. Any inadvertent disclosure of such privileged or protected information or documents shall not be construed to waive any applicable privileges or protections in any respect or any related grounds for objecting to discovery or admissibility regarding a protected document or regarding the subject matter thereof. Nor shall such inadvertent production or disclosure waive DuVernay's right to object to the use of any such document or information during this action or in any subsequent proceedings.

5. DuVernay objects to the Interrogatories, and to the definitions and instructions they incorporate, to the extent that they call for legal conclusions or are predicated upon unsupported legal conclusions asserted by Plaintiff.

6. DuVernay objects to each Request to the extent it seeks information not relevant to the causes of action or defenses of any party to this action or is not reasonably calculated to lead to the discovery of admissible evidence.

7. DuVernay objects to each Interrogatory to the extent that it is vague, ambiguous, overbroad, or unduly burdensome, including to the extent that they seek identification of "all" persons.

8. DuVernay's decision to provide information requested, notwithstanding the objectionable nature of any of the Interrogatories themselves, is not (a) a concession that the material is relevant to this proceeding; (b) a waiver of the General Objections or the objections asserted in response to specific Interrogatories; or (c) an agreement that requests for similar information will be treated in a similar manner.

9. DuVernay expressly reserves the right to rely on, at any time, including trial, subsequently discovered information of which DuVernay is currently unaware or information omitted from these responses as a result of mistake, error, oversight, or inadvertence.

10. DuVernay's investigation is ongoing and DuVernay reserves the right to supplement or amend the responses herein during the course of discovery.

11. DuVernay's Specific Objections and Responses to the Requests are made subject to and without waiving, the foregoing General Objections, which are incorporated by reference in each of the below Responses.



SPECIFIC OBJECTIONS AND RESPONSES

Subject to and without waiver of the foregoing objections, DuVernay responds as follows:

Interrogatory No. 1: Identify all persons whom You interviewed about, or otherwise discussed, the Central Park Jogger case as part of any research You conducted for WTSU.

RESPONSE: DuVernay objects to Interrogatory No. 1 as overbroad and not proportional to the needs of the case to the extent it seeks identification of "all persons", uses the broad term "discussed" and is not limited to information about Fairstein. DuVernay also objects to the extent the term "otherwise discussed" seeks to include an exhaustive list of all persons contacted as part of research for the Series, regardless of what was discussed. Subject to and without waiver of the foregoing objection, DuVernay states that she will produce documents responsive to this Request.

Further answering, DuVernay states that she, or someone at her direction, communicated with the following individuals about the Central Park Jogger case as part of her research:

- Raymond Santana, Jr.
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Kevin Richardson
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Antron McCray
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Yusef Salaam
c/o Karen Dippold
Beldock Levin & Hoffman
99 Park Avenue, Penthouse Suite
New York, NY 10016
- Korey Wise
c/o Jane Fisher-Bryalsen
Fisher & Byrialsen, PLLC
4600 S. Syracuse St.
Denver, CO 80237
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- Sarah Burns
c/o Drew Patrick
Drew Patrick Law, PLLC
45 Main Street, Suite 1030
Brooklyn, NY 11201


- Jane Fisher-Bryalsen
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4600 S. Syracuse St.
Denver, CO 80237
- Michael Warren
300 Wall St. Suite 800
New York, NY 10005
- Mickey Joseph
99 Wall St., Suite 3870
New York, NY 10005
- Angela Cuffee Black
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Linda McCray
Ms. McCray passed away in March 2019
- Deloris Wise
c/o Jane Fisher-Bryalsen
Fisher & Byrialsen, PLLC
4600 S. Syracuse St.
Denver, CO 80237
- Grace Cuffee
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Sharonne Salaam
c/o Karen Dippold
Beldock Levin & Hoffman
99 Park Avenue, Penthouse Suite
New York, NY 10016
- Raymond Santana, Sr.
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083

Interrogatory No. 2: Identify all persons who provided documents, communications or any other information to You about Fairstein's role in the Central Park Jogger case.

RESPONSE: DuVernay objects to the phrase "other information" as ambiguous. Subject to and without waiver of the foregoing objection, DuVernay states that she will produce documents responsive to this Request and further answering states that the following people either provided documents or communications, or may have provided other information to her, or someone she was working with on Series, about Fairstein's role in the Central Park Jogger case:

- Raymond Santana, Jr.
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Kevin Richardson
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083
- Antron McCray
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- Raymond Santana, Sr.
c/o Kendall A. Minter
Minter & Associates, LLC
5398 E. Mountain Street
Stone Mountain, GA 30083

DuVernay also received certain research materials from Berry Welsh at Tribeca Productions, Inc., including but not limited to news articles.

The above list does not include the names of people who administratively gathered research materials for DuVernay's review, or the names of authors of books, news articles or other research materials which DuVernay reviewed, other than Ms. Burns who provided documents and materials to DuVernay.

Dated: January 31, 2022

/s/ Natalie J. Spears

Natalie J. Spears (*pro hac vice*)

Gregory R. Naron (*pro hac vice*)

Jacqueline A. Giannini (*pro hac vice*)

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Attorneys for Defendant Ava DuVernay

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2022, I served a true and correct copy of the foregoing on the following by email:

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Kara L. Gorycki

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New York, New York 10001

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kgorycki@nmlplaw.com

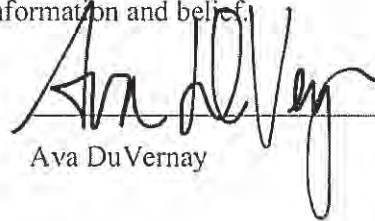
/s/ Natalie J. Spears

Natalie J. Spears

VERIFICATION

I, Ava DuVernay, state that I have read the foregoing Defendant Ava DuVernay's First Supplemental Responses and Objections To Plaintiff's First Set of Interrogatories, the contents of which are true and correct to the best of my knowledge, information and belief.

Executed on this 28th day of January, 2022.


Ava DuVernay